

UNITED STATES OF AMERICA)
)
v.) No. 2:19-CR-00014-JRG
)
XIAORONG YOU)

Counsel for the defendant, Dr. Xiaorong You, respectfully moves this Court for an Order granting a furlough or temporary release from custody, and to allow the Defendant to be housed in a local hotel during the course of the trial. In support of this Motion, the defendant would show unto the Court, as follows:

1. The defendant is currently housed in the Washington County Detention Center, approximately 45 minutes from the James H. Quillen United States Courthouse.
2. The United States Marshall Service plans to transport the defendant from the Detention Center to the Courthouse, and then back to the Detention Center at the conclusion of testimony each day during the trial.
3. Based on information and belief, the women's pod at the Detention Center is overcrowded, and counsel and the defendant are concerned with the defendant potentially losing her bed and associated personal items, which is especially concerning considering the stress the defendant will be under during a trial of this magnitude.
4. Furthermore, the defense team will need to meet and consult with the defendant during the course of the trial. It is highly unlikely the Detention Center will allow an

after normal business hours meeting with the defendant, either in person or via zoom.

5. It is paramount to the defendant and the defense team to be able to have contact with the defendant to prepare her for any potential testimony, and consult with her on developments during the trial.
6. The defendant will be responsible for any costs associated with housing at the hotel.
7. Further the defendant will submit to all conditions this Court might impose, such as use of electronic location monitoring, confinement to only the hotel room, and removal of all telephones, televisions, or any other items the Court deems appropriate to remove from the room.

WHEREFORE, the defendant respectfully requests this Court grant this Motion for Furlough or Temporary Release from Custody and permit the defendant to be house in a local hotel during the trial.

Respectfully Submitted,

s/ Corey B. Shipley

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s/Thomas C. Jessee

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 25th day of March 2021 a true and exact copy of this Motion was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

s/Thomas C. Jessee

Thomas C. Jessee